

CERTIFICATE OF CONFERRAL

I, Benjamin D. Webb, as counsel for the movant, Defendant, Michael Russin, hereby certify that I have made good faith efforts to confer with the non-moving party to determine whether she consents or opposes the foregoing Motion for Leave to Serve Additional Discovery. On March 16, 2023, I sent counsel for the Plaintiff correspondence via electronic mail requesting her consent to file this motion for leave. Counsel for Plaintiff has not responded.

Dated: March 17, 2023

s/Benjamin D. Webb
Benjamin D. Webb